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December 30, 2020

VIA ECF

The Honorable Judge Dora Irizarry
United States District Court—E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Windward Bora LLC v. Mosammat Begum, et al., 18-cv-06423-DLI-RER

Dear Judge Irizarry:

I am the attorney for Defendant Mosamat Begum (“Defendant”) in the above-referenced foreclosure case. Governor Cuomo just signed into law the "COVID-19 Emergency Eviction and Foreclosure Prevention Act of 2020.” A copy is attached. Ms. Begum, occupies the property which is the subject of the above referenced foreclosure matter as her primary residence. She lost her job as a result of the COVID-19 Pandemic and is experiencing a financial hardship as a result of same. As a result, under, the new law, she is entitled to a stay of the foreclosure until May 1, 2021. She has completed the attached declaration required by the new law in order to obtain qualify for a stay of the foreclosure until May 1, 2021.

As such Defendant requests that this court suspend the briefing schedule for the motion for summary judgment and reset the deadline for Plaintiff to file until after May 1, 2021.

The Defendant would like to settle this matter and retain her home and is seeking assistance from Plaintiff to enter into an affordable loan modification. To that end the parties are currently engaged in settlement discussions.

We thank the Court for its review of this submission.

Respectfully Submitted,

Gerard Law Firm

/s/ David J. Gerard
David J. Gerard
Attorneys for Defendant

CC: Alyssa Knapper (VIA ECF); Alan Weinreb (VIA ECF)